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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

RYAN CRUZ,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Case No.: 2:22-cv-00604-GMN-VCF

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY
DEADLINES**

(FIRST REQUEST)

Pursuant to LR 26-3, Plaintiff Ryan Cruz (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”) (collectively, the “parties”), hereby jointly move to extend all deadlines set forth in the Discovery Plan and Scheduling Order filed with this Court on June 29, 2022 (ECF No. 12) by a period of seventy-five (75) days. In support thereof, the parties state as follows:

1. On April 11, 2022, Plaintiff filed his Complaint (ECF No. 1) against Defendant Experian Information Solutions, Inc.
2. The Court entered the parties’ Joint Proposed Discovery Plan and Scheduling Order on June 29, 2022 (ECF No. 12).
3. The parties have completed the following discovery to date: The parties have served and

1 responded to a first round of written discovery, have exchanged their initial disclosures,
 2 and served their first set of document production.

- 3 4. The parties still need to serve additional written discovery, conduct depositions, serve
 4 subpoenas, conduct third-party depositions, and conduct expert discovery.
- 5 5. The parties require more time, and accompanying deadlines from the Court, to adequately
 6 conduct discovery due to scheduling conflicts.
- 7 6. Good cause exists for the requested extension. Namely, a key member of Plaintiff's
 8 litigation team had to address an unforeseen family medical emergency and therefore was
 9 out of the office from August 31, 2022 – September 9, 2022. The emergency caused
 10 interferences with the parties' settlement discussions, depositions, and expert disclosures.
- 11 7. The additional time will allow the parties to conduct additional fact discovery, including
 12 taking depositions, acquiring all documents from third-parties, resolving any discovery
 13 issues, and additional time to adequately determine whether expert discovery will be
 14 needed in this matter. The parties have also engaged in settlement discussion and the
 15 additional time will assist in continuing those discussions and explore a mediation or
 16 settlement conference.
- 17 8. No party will be prejudiced by this Court granting this Stipulation as all parties jointly seek
 18 an extension of these deadlines. Moreover, the parties believe that allowing the extension
 19 will serve the ends of judicial economy.
- 20 9. The requested extension is not sought for the purposes of delay.
- 21 10. It is hereby requested that the Court extend discovery in the present matter as follows:

22 **a. Discovery Plan:**

23 24 25 26 27 28	Discovery Cutoff	February 3, 2023
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Deadline to Disclose Initial Expert Disclosures	December 9, 2022 ¹
Deadline to Disclose Rebuttal Expert Disclosures	January 6, 2023
Deadline to File Dispositive Motions	March 6, 2023

- b. **Pre-Trial Order:** The parties shall file a joint pretrial order not later than ~~March~~ April 6, 2023 or thirty (30) days after the date set for filing dispositive motions. In the event that the parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after the decision on the dispositive motion or further order of the Court.

WHEREFORE, Plaintiff and Defendant Experian Information Solutions, Inc. respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above and (2) reissue a new Scheduling Order to reflect the requested extension.

IT IS SO ORDERED.

9-21-2022

Date


UNITED STATES MAGISTRATE JUDGE

¹ The parties acknowledge that the extension is requested within 21 days of the deadline. Pursuant to LR 26-3, good cause exists as the parties have diligently been pursuing settlement along with initial discovery. The parties did not anticipate the interruption of settlement discussions and expert discovery due to the unforeseen medical emergency cited above.

Respectfully submitted this 9th day of September 2022,

/s/ Steven A. Alpert

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notice of such filing to all attorneys of record in this matter.

/s/ Roxanne Harris